

DuPont
Performance Elastomers

September 21, 2011

Dept. of Environmental Quality
Office of Environmental Compliance
Title V Program
P. O. Box 4312
Baton Rouge, LA 70821-4312

CERTIFIED MAIL NO. 7004 0750 0003 0913 8131



Re: 2011 – First Semiannual Monitoring Reports
Agency Interest No. 38806
Permit Nos. 3000-V3, 2249-V6, 206-V2

As required by LAC 33:III.535.R.3 and 537.XI.C, DuPont Performance Elastomers L.L.C. is submitting the 2011 first semiannual monitoring reports for the following units:

Chloroprene Unit, Permit No. 3000-V3
Neoprene Unit, Permit No. 2249-V6
HCL Recovery Unit, Permit No. 206-V2

If you have any questions or need additional information you can contact me at (985) 536-5437 or at doris.b.grego@usa.dupont.com.

Sincerely,

Doris B. Grego

Doris B. Grego, P.E.
Environmental Technical Associate

Enclosures

ATTACHMENT 1
1H11 REPORT
CHLOROPRENE UNIT
PERMIT 3000-V3



**Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Chloroprene Unit
LaPlace, LA**

Applicable Reporting Period: 01/01/11 to 06/30/11
mm/dd/yy mm/dd/yy

Company and Facility Identification					
Permit Number	3000-V3	Parish	St. John the Baptist	Date Permit Issued	Jan 4, 2010
Company Name	DuPont Performance Elastomers L.L.C.				
Facility Name	Pontchartrain Site			Agency Interest Number	38806
Mailing Address	560 Highway 44				
City	LaPlace	State	Louisiana	Zip Code	70068
Contact Person	Doris B. Grego	Phone #	(985) 536-5437	Fax #	(985) 536-5423
Principal Facility Product/Business	Manufacture of Chloroprene and Neoprene				

Certification of Truth, Accuracy, and Completeness	
I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.	
Responsible Official (signature)	<i>Walter L. Glenn</i> 9-23-2011
Responsible Official (typed)	Walter L. Glenn Date
Responsible Official Title	Plant Manager



**Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Chloroprene Unit
LaPlace, LA**

Deviation Reporting

Title V Permit Number: 3000-V3 Company Name: DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site AI Number: 38806

Question	Response (Yes/No)	If the deviations have been previously reported, please reference below the report and date of the report.
Are there any instances of deviation from permit requirements being reported with this semiannual monitoring report? If yes, and they have not been previously reported, then complete the table entitled "Deviation Summary Report."	Yes	

- * As with all Title V air permit application forms and compliance certifications, deviation reports must contain certification by a responsible official of truth, accuracy, and completeness. Also, any previous deviation reports must contain the information necessary to complete the "Deviation Summary Report" present. Therefore, if these two conditions are not satisfied, then the deviations inappropriately reported before must be appropriately reported in the "Deviation Summary Report."



Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Chloroprene Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 3000-V3 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, Chloroprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT046 (1117-1 DCB Storage Tanks Vent)	Toluene Chloroprene Non-tox VOCs	96 And State Only Spec. Condition # 2 & #3	LAC 33:III.501.C.6 Terms and conditions to ensure compliance.	Continuous monitoring of temperature. Inspection of brine lines and pump pressure once per shift.	Monitor and record temp., brine lines and pump pressure once per shift.
EQT013 (1110-2A DCB Storage Tanks Vent - 1031 Area)	Chloroprene, Non-tox VOCs	51 And State Only Spec. Condition # 2	LAC 33:III.501.C.6 Terms and conditions to ensure compliance.	Continuous monitoring of temperature. Inspection of brine lines and pump pressure once per shift.	Monitor and record temp., brine lines and pump pressure once per shift.
EQT017 (1110-3 Isom Reactor Vent - North)	Toluene Chloroprene Non-tox VOCs	62, 63 And State Only Spec. Condition # 2	LAC 33:III.501.C.6 Terms and conditions to ensure compliance.	Monitor and record temperatures once per shift. Inspect brine lines and pump pressure once per shift.	Monitor and record temp., brine lines and pump pressure once per shift



Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Chloroprene Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 3000-V3 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, Chloroprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT017 (1110-3 Isom Reactor Vent – South)	Toluene Chloroprene Non-tox VOCs	62, 63 And State Only Spec. Condition # 2	LAC 33:III.501.C.6 Terms and conditions to ensure compliance.	Monitor and record temperatures once per shift. Inspect brine lines once and pump pressure per shift.	Monitor and record temp. and brine lines once per shift.
HCl Scrubber	HCl	64	LAC 33:III.501.C.6 Terms and conditions to ensure compliance.	Visually inspect the scrubber, once per shift, to confirm that is functioning properly.	Inspect and confirm scrubbers are working, once per shift.
EQT026 (1110-4 CD Vent Condenser)	Toluene Chloroprene Non-tox VOCs	88 And State Only Spec. Condition # 2	LAC 33:III.501.C.6 Terms and conditions to ensure compliance.	Continuous monitoring of temperature. Inspection of brine lines and pump pressure once per shift.	Monitor and record temp. and brine lines once per shift.



Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Chloroprene Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 3000-V3 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, Chloroprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT026 (1110-4 CD Vent Condenser)	Toluene Chloroprene Non-tox VOCs	88 And Part 70 Spec. Condition # 2	40 CFR 63.100, 113(a)(3) and 113(d) Group 2 process vent with TRE between 1 and 4. Maintain average daily cooling media temperature at 10°C or below.	Continuous temperature monitored.	Daily average cooling media temperature.
EQT059 (1140-20 Aqueous Storage Vent Condenser)	Toluene Chloroprene Non-tox VOCs	114 And State Only Spec. Condition # 2	LAC 33:III.501.C.6 Terms and conditions to ensure compliance.	Monitor and record temperatures once per shift. Inspect brine lines and pump pressure once per shift.	Monitor and record temp. and brine lines once per shift.
EQT006 (1110-2 HCl Scrubber @ Refining Jets Vent)	HCl	11	LAC 33:III.501.C.6 Terms and conditions to ensure compliance.	Visually inspect the scrubber, once per shift, to confirm that is functioning properly.	Inspect and confirm scrubbers are working, once per shift.



Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Chloroprene Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 3000-V3 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, Chloroprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT067 (7000-10A Monomer Flare)	Butadiene	145, 157	40 CFR63.11(b)(4) and LAC 33:III.1105 Opacity <20%, no visible emissions	Once a shift the flare stack is inspected for smoke or other visible emissions	Visual inspections
		146, 147	40 CFR63.11(b)(5) Flame present at all times and monitored continuously	The flare is equipped with a thermostat, the temperature is tracked continuously. An alarm will sound in the control room when the temperature goes below set limit.	Monitor temperature continuously
FUG001 (3-91 Fugitive Emissions)	Chloroprene, Toluene, Butadiene	344-363 255-343	This unit will comply with the applicable requirements of LAC 33:III.2121 This unit will comply with the applicable requirements of 40 CFR 63, Subpart H.	Components in organic service are monitored as required under LAC 33:III.2121 and 40 CFR 63, Subpart H. Reports are submitted to the State and EPA, and records are maintained on site for a period of three years.	Monitoring of components as stated on the referenced regulations.



Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Chloroprene Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 3000-V3 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, Chloroprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT 0098 to 101 1110-25, 25A, 25A.1 and 25B		184, 186, 188, 190	LAC 33:III.1311.C Maintain opacity at $\leq 20\%$	Visual checks of stacks when mixing stabilizer.	Monitor as needed.



Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Chloroprene Unit
LaPlace, LA
SEE ATTACHMENT I FOR DETAILS

Deviation Summary Report (Continued)

Title V Permit Number: 3000-V3 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, Chloroprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Deviation Began		Deviation Ended		Total No. of Hours	Cause(s) of Deviation	Corrective Action(s) Taken
	Date	Time	Date	Time			
1140-20	6/4	12:55	6/4	21:47	8 hrs 52 min	Condenser temperature was above permit limit due to refrigeration unit outage.	See Note 1 on page 12.
1117-1 1110-2A 1140-20	6/4	11:56	6/4	22:16	10 hrs 20 min	Pump pressure below the permit limit due to refrigeration unit outage.	See Note 1 on page 12.

ATTACHMENT I

Semiannual Monitoring Report For the Period of January 1 to June 30, 2011

Chloroprene Unit - Monitoring Requirements

Source Number	Permit Condition	Requirement	Status of Compliance
EQT046 (1117-1 DCB Storage Tanks Vent)	96 And State Only Specific Conditions # 2 & #3	Maintain cooling media temperature at 5°C or below, monitored after the refrigeration machines. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	<p>The cooling media for this source is required to be monitored at the exit of the refrigeration machines. No exceedances on the cooling media temperature were experienced during this reporting period while the unit was in operation.</p> <p>Brine lines are monitored once per shift and readings are recorded in the Turnover Database, Monomer-Resom Log. All readings were taken during this reporting period.</p> <p>Discharge pump pressure is monitored through our computer data gathering system. Pressure was maintained within the limits while the unit was in operation except as indicated on Note 1, page 12.</p>
EQT013 (1110-2A DCB Storage Tank Vent - 1031 Area)	51 And State Only Specific Condition # 2	Maintain cooling media temperature at 5°C or below, monitored after the refrigeration machines. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	<p>The cooling media for this source is required to be monitored at the exit of the refrigeration machines. No exceedances on the cooling media temperature were experienced while the unit was in operation.</p> <p>Brine lines are monitored once per shift and readings are recorded in the Turnover Database, Monomer-Chlorine Services Log. All readings were taken during this reporting period.</p> <p>Discharge pump pressure is monitored through our computer data gathering system. Pressure was maintained within the limits while the unit was in operation except as indicated on Note 1, page 12.</p>

ATTACHMENT I (continued)**Semiannual Monitoring Report
For the Period of January 1 to June 30, 2011****Chloroprene Unit - Monitoring Requirements**

Source Number	Permit Condition	Requirement	Status of Compliance
EQT017 (1110-3 Isom Reactor Vent – North)	62, 63 And State Only Specific Condition # 2	Maintain cooling media temperature at 0°C or below, monitored at the condenser inlet. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	Readings of the cooling media temperature and brine flow are taken once per shift and readings are recorded in the Turnover Database, Monomer-Resom Log. All readings were taken during this reporting period and are within permit limits. Discharge pump pressure is monitored through our computer data gathering system. Pressure was maintained within the limits while the unit was in operation. (On 6/4 the pressure was below the permit limits but this source was down.)
EQT017 (1110-3 Isom Reactor Vent – South)	62, 63 And State Only Specific Condition # 2	Maintain cooling media temperature at 5°C or below, monitored at the condenser inlet. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	Readings of the cooling media temperature, brine flow and discharge pressure are taken once per shift and readings are recorded in the Turnover Database, Monomer-Resom Log. All readings were taken during this reporting period and are within permit limits.
EQT017 (1110-3 HCl Scrubber)	64	Visually inspect the scrubber, once per shift, to confirm that is functioning properly.	This scrubber is inspected once a shift and readings recorded in the Turnover Database, Monomer-Resom Log. All readings were taken during this reporting period.

ATTACHMENT I (continued)

Semiannual Monitoring Report For the Period of January 1 to June 30, 2011

Chloroprene Unit - Monitoring Requirements

Source Number	Permit Condition	Requirement	Status of Compliance
EQT026 (1110-4 CD Vent Condenser)	88 And State Only Specific Condition # 2	Maintain cooling media temperature at 5°C or below, monitored at the brine pump outlet. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	No exceedances on the cooling media temperature were experienced during this reporting period while the unit was in operation. Pressure on the brine pumps was within the permit limits during this reporting period. Observations of the brine flow are taken once per shift and documented in the Turnover Database, Monomer-CD Synthesis Log. All readings were taken during this reporting period.
	88 And Part 70. Spec. Condition #2	40 CFR 63.100, 113(a)(3) and 113(d) Group 2 process vent with TRE between 1 and 4. Maintain cooling media temperature at 10°C or below.	The cooling media for this condenser was maintained below 10°C during this reporting period while the unit was in operation.
EQT059 (1140-20 Aqueous Storage Vent Condenser)	114 And State Only Specific Condition # 2	Maintain cooling media temperature at 5°C or below, monitored at the brine pump outlet. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	The temperature of the cooling media was within the permit limits during this reporting period. Readings of the brine are taken once per shift and readings are recorded in the Turnover Database, Monomer-Brine Services Log. All readings were taken during this reporting period. Discharge pump pressure is monitored through our computer data gathering system. Pressure was maintained within the limits while the unit was in operation except as indicated on Note 1, page 12.
EQT006 (1110-2 HCl Scrubber @ Refining Jets Vent)	11	Visually inspect the scrubber, once per shift, to confirm that is functioning properly.	This scrubber is inspected once a shift and readings recorded in the Turnover Database, Monomer-Resom Log. All readings were taken during this reporting period.

ATTACHMENT I (continued)

Semiannual Monitoring Report For the Period of January 1 to June 30, 2011

Chloroprene Unit - Monitoring Requirements

Source Number	Permit Condition	Requirement	Status of Compliance
EQT067 (7000-10A Monomer Flare)	145, 157,	Opacity <20%, no visible emissions	Flare visual readings are taken once per shift and recorded in the Turnover Database, Monomer-HCl Log. All readings were taken during this reporting period.
	146, 147	Flame present at all times and monitored continuously	The flare is equipped with a thermostat and the temperature of the flare is monitored continuously. During this reporting period the only time the flame was not present was when the flare was down for maintenance while the units were down.
FUG001 (3-91 Fugitive Emissions)	344-363	This unit will comply with the applicable requirements of LAC 33:III.2121	Fugitive emissions monitoring is performed as required under these regulations.
	255-343	This unit will comply with the applicable requirements of 40 CFR 63, Subpart H.	
EQT 0098 to EQT 101 1110-25, 25A, 25A.1 and 25B	184, 186, 188, 190	LAC 33:III.1311.C Maintain opacity at $\leq 20\%$	These vents are visually inspected for opacity while mixing the stabilizer. This is the only operation of the system that could generate particulate emissions. All readings were taken during this reporting period.

Note 1 – The site has three refrigeration units (#1, #2 and #4) which provide cooling brine for the condensers at the site. On Friday 6/3/11, the #1 Refrigeration Unit was taken down for repairs. It was noted that the #1 unit could not be isolated from the main brine supply system because of brine isolation valve leak through. As a result, the remaining Refrigeration Units (#2 & #4) were taken out of service. All areas were informed. The Chloroprene Unit started shutdown on Friday evening (6/3) and completed it by Saturday (6/4) morning. Following unit shutdowns, all refrigeration units were taken down. As a result of the refrigeration outage, the Aqueous Vent Condenser (1140-20) system temperature rose above the 5 degrees C permit limit for about 10 hours. Additionally, low pressure on the brine system triggered a deviation on two other sources. The pressure exit the refrigeration units is a parameter used to determine if brine is flowing through the systems. The tanks venting through sources 1117-1 and 1110-2A were isolated so that no process could enter or leave the tanks. The nitrogen purges were also valved out from the tanks to minimize emissions.

ATTACHMENT 2
1H11 REPORT
NEOPRENE UNIT
PERMIT 2249-V6



Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Neoprene Unit
LaPlace, LA

Applicable Reporting Period: 01/01/11 to 06/30/11
mm/dd/yy mm/dd/yy

Company and Facility Identification					
Permit Number	2249-V6	Parish	St. John the Baptist	Date Permit Issued	June 16, 2009
Company Name	DuPont Performance Elastomers L.L.C.				
Facility Name	Pontchartrain Site			Agency Interest Number	38806
Mailing Address	560 Highway 44				
City	LaPlace	State	Louisiana	Zip Code	70068
Contact Person	Doris B. Grego	Phone #	(985) 536-5437	Fax #	(985) 536-5423
Principal Facility Product/Business	Manufacture of Chloroprene and Neoprene				

Certification of Truth, Accuracy, and Completeness			
I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.			
Responsible Official (signature)	<i>Walter L. Glenn</i>		
Responsible Official (typed)	Walter L. Glenn	Date	9-23-2011
Responsible Official Title	Plant Manager		



**Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Neoprene Unit
LaPlace, LA**

Deviation Reporting

Title V Permit Number: 2249-V6 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site **AI Number:** 38806

Question	Response (Yes/No)	If the deviations have been previously reported, please reference below the report and date of the report.
Are there any instances of deviation from permit requirements being reported with this semiannual monitoring report? If yes, and they have not been previously reported, then complete the table entitled "Deviation Summary Report."	No	

- * As with all Title V air permit application forms and compliance certifications, deviation reports must contain certification by a responsible official of truth, accuracy, and completeness. Also, any previous deviation reports must contain the information necessary to complete the "Deviation Summary Report" present. Therefore, if these two conditions are not satisfied, then the deviations inappropriately reported before must be appropriately reported in the "Deviation Summary Report."



Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Neoprene Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 2249-V6 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, Neoprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT 0193 1700-74 Bag Filter	Particulates	76	LAC 33:III.1311.C Maintain opacity at $\leq 20\%$	Visual checks of stack when mixing stabilizer.	Monitor as needed.
RLP 0013 1700-14B3 Manhole Vent	Particulates	140	LAC 33:III.1311.C Maintain opacity at $\leq 20\%$	Visual checks of stack when mixing stabilizer.	Monitor as needed.
RLP0014 1700-2 Strippers Condenser Vent	Toluene Chloroprene Ammonia	143	40 CFR 63.114(c)(3) - Parameters Monitoring Requirements	Water Condenser – Maintain daily average cooling media temperature at 50°C or below.	Monitor and record temp. daily of the cooling water loop.
		143	40 CFR 63.114(c)(3) - Parameters Monitoring Requirements	CD Condenser - Maintain daily average cooling media temperature at 5°C or below.	Monitor and record temp. daily of the cooling brine loop.
		143	40 CFR 63.114(c)(3) - Parameters Monitoring Requirements	Common Condenser - Maintain daily average cooling media temperature at -15°C or below measured at the condenser brine inlet.	Monitor and record temp. daily at the condenser inlet.



Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Neoprene Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 2249-V6 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, Neoprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
RLP0015 1700-3 Kettles Condenser	Toluene Chloroprene	161	LAC 33:III.501.C.6 Terms and conditions to ensure compliance	Brine Condenser - Maintain daily average cooling media temperature at 5°C or below measured at the condenser brine outlet.	Monitor and record temp. daily.
		162	LAC 33:III.501.C.6 Terms and conditions to ensure compliance	Monitor valves on brine lines once per shift.	Monitor valves once per shift.
FUG0004 (3-91 Fugitive Emissions)	Toluene Chloroprene	95-99	Comply with the applicable requirements of LAC 33:III.2121 Comply with the applicable requirements of 40 CFR 63.502	Components in organic service are monitored as required under LAC 33:III.2121 and 40 CFR 63.502. Reports are submitted to the State and EPA, and records are maintained on site for a period of three years.	As required



Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Neoprene Unit
LaPlace, LA
SEE ATTACHMENT I FOR DETAILS

Deviation Summary Report (Continued)

Title V Permit Number: 2249-V6 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, Neoprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Deviation Began		Deviation Ended		Total No. of Hours	Cause(s) of Deviation	Corrective Action(s) Taken
	Date	Time	Date	Time			

ATTACHMENT I

Semiannual Monitoring Report For the Period of January 1 to June 30, 2010

Neoprene Unit - Monitoring Requirements

Source Number	Permit Condition	Compliance Method	Status of Compliance
EQT 0193 1700-74 Bag Filter	76	LAC 33:III.1311.C Maintain opacity at $\leq 20\%$	This vent is visually inspected for opacity while mixing the stabilizer. This is the only operation of the system that could generate particulate emissions. Opacity was maintained within the permit limits during this reporting period.
RLP 0013 1700-14B3 Manhole Vent	140	LAC 33:III.1311.C Maintain opacity at $\leq 20\%$	This vent is visually inspected for opacity while mixing the stabilizer. This is the only operation of the system that could generate particulate emissions. Opacity was maintained within the permit limits during this reporting period.
RLP 0014 1700-2 Stripper Condenser Vent	143	<p><u>Water Condenser</u> - Maintain daily average cooling media temperature at 50°C or below. (Sampling point is at the cooling water loop - 17361053tt.)</p> <p><u>CD Condenser</u> - Maintain daily average cooling media temperature at 5°C or below. (Sampling point is at the cooling brine loop -17361058tt.)</p> <p><u>Brine Condenser</u> - Maintain daily average cooling media temperature at -15°C or below. Sampling point is located at the condenser brine inlet, it is monitored at the brine supply header. (BRNSUPHDRTMP)</p>	The temperature data of the cooling media of these condensers is monitored by our computer data system. All data for this reporting period was reviewed and no exceedances were found while the strippers were in operation.
RLP0015 1700-3 Kettles Condenser	161	<u>Brine Condenser</u> - Maintain daily average cooling media temperature at 5°C or below. Sampling point is located at the condenser brine outlet. (1736081tt)	The temperature of the cooling brine is monitored by our computer system. All data for this reporting period was reviewed and no exceedances were found while the kettles were in operation.
	162	Inspect valves on the cooling media lines once per shift.	The cooling media lines are inspected once per shift and observations recorded in the Turnover Database. All readings were taken during this reporting period.

ATTACHMENT 3
1H11 REPORT
HCL RECOVERY UNIT
PERMIT 206-V2



**Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, HCl Unit
LaPlace, LA**

Applicable Reporting Period: 01/01/11 to 06/30/11
mm/dd/yy mm/dd/yy

Company and Facility Identification					
Permit Number	206-V2	Parish	St. John the Baptist	Date Permit Issued	March 14, 2011
Company Name	DuPont Performance Elastomers L.L.C.				
Facility Name	Pontchartrain Site, HCl Recovery Unit			Agency Interest Number	38806
Mailing Address	560 Highway 44				
City	LaPlace	State	Louisiana	Zip Code	70068
Contact Person	Doris B. Grego	Phone #	(985) 536-5437	Fax #	(985) 536-5423
Principal Facility Product/Business	Manufacture of Chloroprene and Neoprene				

Certification of Truth, Accuracy, and Completeness			
I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.			
Responsible Official (signature)	<i>Walter L. Glenn</i>		9-23-2011
Responsible Official (typed)	Walter L. Glenn	Date	
Responsible Official Title	Plant Manager		



Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, HCl Unit
LaPlace, LA

Deviation Reporting

Title V Permit Number: 206-V2 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site **AI Number:** 38806

Question	Response (Yes/No)	If the deviations have been previously reported, please reference below the report and date of the report.
Are there any instances of deviation from permit requirements being reported with this semiannual monitoring report? If yes, and they have not been previously reported, then complete the table entitled "Deviation Summary Report."	No	

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Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, HCl Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 206-V2 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, HCl Recovery Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT-82 1180-21	HCl	1	LAC 33:III.507.H.1.a Inspect the HCl Product Tank's Scrubber at least once per shift to confirm the scrubber is functioning properly.	This scrubber is inspected once per shift.	Once per shift
EQTs-83, 84 and 85 1180-21.1, 21.2 and 21.3	HCl	4, 6, 8	LAC 33:III.501.C.6 Maintain product acid concentration above 3% after the unit has been in operation for one hour. Perform product concentration tests at least once per shift.	Specific gravity tests are performed on the acid once per shift.	Once per shift
EQT86 7000-15	Particulates	19	LAC 33:III.1101.B Maintain opacity at $\leq 20\%$	Visual check of stack once per shift	Not specified
EQT86 7000-15	Particulates	20	LAC 33:III.1313.C Total suspended particulate ≤ 0.6 lb/MMBTU of heat input	Calculations available on site	Not specified
EQT86 7000-15	CO	22.1, Table 1	LAC 33:III.507.H.1.a Carbon Monoxide concentration – one hour rolling average corrected to 7% oxygen – 100 ppm (maximum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	Continuous monitoring of CO concentration.	Continuous



Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, HCl Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 206-V2 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, HCl Recovery Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO _x , CO, SO ₂	22.2	LAC 33:III.507.H.1.a Oxygen in the flue gas – 2% (minimum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	Continuous monitoring of oxygen concentration in the flue gas.	Not specified.
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO _x , CO, SO ₂	22.3, 28.B4, Table 1	LAC 33:III.507.H.1.a Combustion Chamber pressure 0.0 in. water (maximum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	Continuous monitoring of chamber pressure.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO _x , CO, SO ₂	22.4, 28.B1	LAC 33:III.507.H.1.a Combustion Chamber temperature 2561°F (1405°C) (minimum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	Continuous monitoring of chamber temperature.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO _x , CO, SO ₂	22.5, 28.B2	LAC 33:III.507.H.1.a Maximum waste flow to the burner system – 3,853 lbs/hr. Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	Continuous monitoring of liquid feed rate.	Continuous



Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, HCl Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 206-V2 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, HCl Recovery Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO _x , CO, SO ₂	22.6, Table 1	LAC 33:III.507.H.1.a Dynawave scrubber differential pressure 14 in. water (minimum) Waste feed must be shutoff if these parameters drift out of permitted range for longer than 5 minutes.	Continuous monitoring of the Dynawave scrubber differential pressure.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO _x , CO, SO ₂	22.7, 28.B5	LAC 33:III.507.H.1.a Dynawave scrubber – pH – 2.1 (min) Waste feed must be shutoff if this parameters drifts out of permitted range for longer than 5 minutes.	Continuous monitoring of the Dynawave scrubber pH.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO _x , CO, SO ₂	22.8	LAC 33:III.507.H.1.a The permittee shall test the automatic cut- off system monthly.	Automatic cut-off system is tested as a minimum on a monthly basis.	Monthly
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO _x , CO, SO ₂	23	LAC 33:III.507.H.1.a Vent Scrubber make up water – 300 lbs/hr (minimum one unit) 600 lbs/hr (minimum two units)	Continuous monitoring of vent scrubber make up water flow.	Not specified.



Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, HCl Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 206-V2 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, HCl Recovery Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO _x , CO, SO ₂	24	LAC 33:III.507.H.1.a The permittee shall shut down the HCl Unit if any of the following occur. Loss of combustion air Power outage Loss of instrument air Loss of cooling water High temperature in the primary Absorber	Systems and procedures are in place to comply with this requirement.	As needed.
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO _x , CO, SO ₂	25	LAC 33:III.507.H.1.a Hazardous waste combusted at this unit is limited to the following rates – 40MM lb/yr Onsite Chlorinated Organic; 20 MM lb/yr Offsite Chlorinated Organic; 8 MM lbs/yr Miscellaneous.	Monthly reports are issued on the amount of waste combusted in this unit. Continuous monitoring of waste feed.	Yearly/Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO _x , CO, SO ₂	26	LAC 33:III.507.H.1.a The permittee shall test metal concentration in the chlorinated hydrocarbon feed as specified by the LDEQ Hazardous Waste Division.	Waste feed stream is sampled once per year as required under the Hazardous Waste Regulations.	Yearly
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO _x , CO, SO ₂	27	LAC 33:III.507.H.1.a The permittee shall comply with all applicable regulations of the LDEQ Hazardous Waste Division	This unit is inspected regularly by the LDEQ Hazardous Waste Division and it has been found in compliance with all regulations.	Continuous



Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, HCl Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 206-V2 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, HCl Recovery Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO _x , CO, SO ₂	28.A	LAC 33:III.507.H.1.a The permittee shall install, maintain and calibrate continuous CO and oxygen analyzers.	Continuous monitoring.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO _x , CO, SO ₂	28.B3	LAC 33:III.507.H.1.a Combustion air flow shall be monitored continuously when the unit is in operation.	Continuous monitoring of combustion air flow.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO _x , CO, SO ₂	28.B6	LAC 33:III.507.H.1.a Dynawave scrubber pressure drop shall be monitored continuously when the unit is in operation.	Continuous monitoring of the Dynawave scrubber pressure drop.	Continuous
EQT86 7000-15	Particulates	30	LAC 33:III.5109.A Particulate concentrations in the flue gas shall not exceed 0.04 grains/dscf at 7% oxygen by volume.	Stack test was performed as required under the Hazardous Waste Regulations; this source meets this emission limit.	Not specified
EQT87 7000-17	Chloroprene, Toluene, HCl, VOCs	33	LAC 33:III.507.H.1.a Inspect the HCl Feed Tank's Scrubber to confirm scrubber is functioning properly.	Scrubber is inspected once per shift.	Once per shift
EQT90 2-74	Chloroprene, Toluene	45	LAC 33:III.501.C.6 Condenser water temperature of 55°F (12.8°C) – maximum	Monitoring of cooling media temperature.	Once per shift



Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, HCl Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 206-V2 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, HCl Recovery Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
FUG0003 3-96	Chloroprene, Toluene, VOCs	72-103	40 CFR 63 & LAC 33:III.2121 The HCl Unit shall comply with the fugitive emissions regulations of 40CFR264, Subpart BB (hazardous waste) and 40CFR 63 Subpart H under the HON.	A fugitive emission program has been implemented at this unit which complies with both set of regulations. Semi-annual reports are sent to the LDEQ.	Monitoring as required (weekly, monthly and/or annual.)
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO _x , CO, SO ₂	Appendix A, Table 1	Maximum Total System Hazardous Waste Feed Rate - 3,853 lbs/hr HRA - AWFCO	Continuous monitoring.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO _x , CO, SO ₂	Appendix A, Table 1	Minimum Combustion Gas Temperature 2561°F (1405°C) HRA - AWFCO	Continuous monitoring.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO _x , CO, SO ₂	Appendix A, Table 1	Maximum Feed Rate of Total Chlorine/Chloride - 2,030 lbs/hr HRA - AWFCO	Continuous monitoring.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO _x , CO, SO ₂	Appendix A, Table 1	Minimum Dynawave Scrubber Pressure Differential - 14 inches of water column HRA - AWFCO	Continuous monitoring.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO _x , CO, SO ₂	Appendix A, Table 1	Minimum Dynawave Scrubber Liquid-to-Gas Ratio - 107 gal/mscf HRA - AWFCO	Continuous monitoring.	Continuous



Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, HCl Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 206-V2 Company Name: DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, HCl Recovery Unit AI Number: 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO _x , CO, SO ₂	Appendix A, Table 1	Minimum Dynawave Scrubber effluent pH – 2.1 HRA - AWFCO	Continuous monitoring.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO _x , CO, SO ₂	Appendix A, Table 1	Maximum Combustion Air Flow Rate (indicator of combustion gas flow rate) 440,840 scfh HRA - AWFCO	Continuous monitoring.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO _x , CO, SO ₂	Appendix A, Table 1	Emission Limit for Carbon Monoxide (corrected to 7% O ₂) – 100 ppmvd HRA - AWFCO	Continuous monitoring.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO _x , CO, SO ₂	Appendix A, Table 1	Maximum Pressure – Each Combustion Chamber – 0 inches of water column Instantaneous - AWFCO	Continuous monitoring.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO _x , CO, SO ₂	Appendix A, Table 1	Minimum Atomization Flow Rate, Each Chamber – 4,000 scfh Instantaneous - AWFCO	Continuous monitoring.	Continuous

HRA – Hourly Rolling Average

AWFCO – Automatic Waste Feed Cutoff

ppmvd - parts per million by volume of a dry basis corrected to 7% oxygen



Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, HCl Unit
LaPlace, LA
SEE ATTACHMENT I FOR DETAILS

Deviation Summary Report (Continued)

Title V Permit Number: 206-V2 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, HCl Recovery Unit **AI Number:** 38806

Emission Source No./ Identifier	Deviation Began		Deviation Ended		Total No. of Hours	Cause(s) of Deviation	Corrective Action(s) Taken
	Date	Time	Date	Time			

ATTACHMENT I

Semiannual Monitoring Report For the Period of January 1 to June 30, 2011

HCl Recovery Unit - Monitoring Requirements

Source Number	Permit Condition	Requirement	Status of Compliance
EQT-82 1180-21	1	Inspect the HCl Product Tank's Scrubber at least once per shift to confirm the scrubber is functioning properly.	Inspections of the HCl Product Tank's Scrubber is documented in the Turnover Database, Monomer-Chlorine Services Log. All readings were taken during this reporting period.
EQTs-83, 84 and 85 1180-21.1, 21.2 and 21.3	4, 6, 8	Maintain product acid concentration above 3% after the unit has been in operation for one hour. Perform product concentration tests at least once per shift.	A review of the acid concentration readings for the reporting period shows the acid concentration was above 3% while the unit was in operation.
EQT86 7000-15	19	Maintain opacity at $\leq 20\%$	Visual checks on the HCl stack were conducted for opacity every shift. Opacity was within limits during all observations.
EQT86 7000-15	22.1	Carbon Monoxide concentration – one hour rolling average corrected to 7% oxygen – 100 ppm (maximum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	A review of the continuous monitoring records of the CO ₂ concentration shows the values were within permit limits while the unit was in operation.
EQT86 7000-15	22.2	Oxygen in the flue gas – 2% (minimum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	A review of the continuous monitoring records of the oxygen concentration shows the oxygen concentration was within permit limits while the unit was in operation.
EQT86 7000-15	22.3, 28.B4	Combustion Chamber pressure 0.0 in. water (maximum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	A review of the continuous monitoring records of the Combustion Chamber pressure shows this pressure was within permit limits while the unit was in operation.
EQT86 7000-15	22.4, 28.B1, Table 1	Combustion Chamber temperature 2561°F (1405°C) (minimum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	A review of the continuous monitoring records of the Combustion Chamber temperature shows this temperature was within permit limits while the unit was in operation.
EQT86 7000-15	22.5, 28.B2, Table 1	Maximum waste flow to the burner system - 3,853 lbs/hr. Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	A review of the continuous monitoring records of the feed shows this unit operated within the permit limits for this reporting period.
EQT86 7000-15	22.6	Dynawave scrubber differential pressure 14 in. water (minimum) Waste feed must be shutoff if these parameters drift out of permitted range for longer than 5 minutes.	A review of the continuous monitoring records of the Dynawave scrubber shows the differential pressure was within the permit limits while the unit was in operation.

ATTACHMENT I

Semiannual Monitoring Report For the Period of January 1 to June 30, 2011

HCl Recovery Unit - Monitoring Requirements

Source Number	Permit Condition	Requirement	Status of Compliance
EQT86 7000-15	22.7, 28.B5, Table 1	Dynawave scrubber – pH – 2.1 (min) Waste feed must be shutoff if these parameters drift out of permitted range for longer than 5 minutes.	A review of the continuous monitoring records of the Dynawave scrubber shows the pH was within the permit limits while the unit was in operation.
EQT86 7000-15	22.8	The permittee shall test the automatic cut-off system monthly.	During the reporting period the automatic cut-off system was tested at least once per month.
EQT86 7000-15	23	Vent Scrubber make up water – 300 lbs/hr (minimum one unit) 600 lbs/hr (minimum two units)	A review of the continuous monitoring records of the vent scrubber make up water shows the make up water was within permit limits while the unit was in operation.
EQT86 7000-15	24	The permittee shall shut down the HCl Unit if any of the following occur. Loss of combustion air Power outage Loss of instrument air Loss of cooling water High temperature in the primary Absorber	Systems and procedures are in place to comply with this requirement.
EQT86 7000-15	25	Hazardous waste combusted at this unit is limited to the following rates – 40MM lbs/yr Onsite Chlorinated Organic; 20 MM lbs/yr Offsite Chlorinated Organic; 8 MM lbs/yr Miscellaneous.	The total amount of waste combusted at this unit during 2010 was 14.3 MM pounds.
EQT86 7000-15	26	The permittee shall test metal concentration in the chlorinated hydrocarbon feed as specified by the LDEQ Hazardous Waste Division.	The Hazardous Waste regulations require yearly sampling of the waste feed for metals. The last test performed shows the metal concentration within the permit limits.
EQT86 7000-15	28.A	The permittee shall install, maintain and calibrate continuous CO and oxygen analyzers.	This unit is equipped with CO and oxygen continuous analyzers.
EQT86 7000-15	28.B3	Combustion air flow shall be monitored continuously when the unit is in operation.	The combustion air flow was monitored continuously during this reporting period.
EQT86 7000-15	28.B6	Dynawave scrubber pressure drop shall be monitored continuously when the unit is in operation.	The Dynawave scrubber pressure drop was monitored continuously during this reporting period.
EQT86 7000-15	30	Particulate concentrations in the flue gas shall not exceed 0.04 grains/dscf at 7% oxygen by volume.	Stack test was performed as required under the Hazardous Waste Regulations; this source meets this emission limit.
EQT86 7000-15	Table 1	Maximum Feed Rate of Total Chlorine/Chloride – 2,030 lbs/hr	A review of the continuous monitoring records shows the maximum chlorine/chloride feed rate was within the permit limits while the unit was in operation.

ATTACHMENT I

Semiannual Monitoring Report For the Period of January 1 to June 30, 2011

HCl Recovery Unit - Monitoring Requirements

Source Number	Permit Condition	Requirement	Status of Compliance
EQT86 7000-15	Table 1	Minimum Dynawave Scrubber Liquid-to-Gas Ratio – 107 gal/mscf	A review of the continuous monitoring records shows the liquid to gas ratio was within the permit limits while the unit was in operation.
EQT86 7000-15	Table 1	Maximum Combustion Air Flow Rate (indicator of combustion gas flow rate) 440,840 scfh	A review of the continuous monitoring records shows the maximum combustion air flow rate was within the permit limits while the unit was in operation.
EQT86 7000-15	Table 1	Minimum Atomization Flow Rate, Each Chamber – 4,000 scfh	A review of the continuous monitoring records shows the atomization flow rate was within the permit limits while the unit was in operation.
EQT87 7000-17	33	Inspect the HCl Feed Tank's Scrubber to confirm scrubber is functioning properly.	Inspection of the HCl Feed Tank's scrubber is recorded in the Turnover Database, Monomer-HCl Log. All readings were taken during this reporting period.
EQT90 2-74	45	Condenser water temperature of 55°F (12.8°C) – maximum (Monitoring requirement, once per shift)	A review of the continuous monitoring records of the condenser water temperature shows this unit operated within the permit limits during this reporting period.
FUG0003 3-96	72-103	The HCl Unit shall comply with the fugitive emissions regulations of 40CFR264, Subpart BB (hazardous waste) and 40CFR 63 Subpart H under the HON.	During the reporting period, fugitive emission monitoring was conducted as required by these regulations. Weekly visual inspections are recorded on form HCl-01. The records for the reporting period were audited, no records were found missing.

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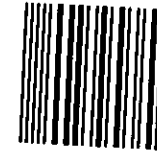
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